

1 I said using the filter you don't need the hot
2 spot in order to be able to receive it. At the location we
3 tested we found that it would only require about 13 dB
4 additional suppression of the -- that was without a
5 filter -- to be able to overcome the WBAI signal, and the
6 phase canceler provides 45, so it is not essential that you
7 be listening at the hot spot.

8 Q Having represented Mr. Turro for the amount of
9 years that you said you have, was there -- did the Fort Lee
10 translator always rebroadcast the signal of WJUX?

11 A No.

12 Q Okay. So at some time an application was made or
13 at some time a decision was made that WJUX Monticello would
14 be translated on the Fort Lee translator; is that correct?

15 A That's correct.

16 Q And has the Fort Lee translator always been
17 located at Mediterranean Towers?

18 A Yes.

19 Q Is the hot spot responsible for the quality -- for
20 the audio quality, the good audio quality you've heard
21 testimony about with respect to the Fort Lee translator
22 being able to rebroadcast a good quality signal from
23 Monticello?

24 A It's a contributing factor.

25 Q How much of a contributing factor, if you can

1 assign a value?

2 A I would say one-third.

3 Q Okay. Okay.

4 And I believe you testified -- are hot spots
5 fairly unusual, in your experience?

6 A I stated that I had seen other hot spots.

7 Q Are reliable hot spots fairly unusual?

8 A I don't know how to quantify that. I don't know
9 what "fairly unusual" means.

10 Q Do you see them often?

11 A No, but I don't make it a practice to go looking
12 for hot spots, so I can't -- i can't testify to their
13 normality.

14 Q So are you suggesting that you would not have
15 suggested to look for a hot spot if there were difficulties
16 in this case? Yes or no? You are maybe suggesting.

17 A No, I have looked for hot spots. I was never
18 involved in a discussion with Mr. Turro about his ability to
19 receive on this building until after this had been
20 established.

21 JUDGE STEINBERG: When you say "this," you're
22 talking about somebody or he found the hot spot?

23 THE WITNESS: Had found the hot spot and was able
24 to set up reception of the Monticello station.

25 MR. ARONOWITZ: Can we go off the record one

1 second?

2 JUDGE STEINBERG: Yes.

3 (Pause off the record.)

4 JUDGE STEINBERG: Back on the record.

5 BY MR. ARONOWITZ;

6 Q Mr. Hurst, in your experience, what would be the
7 probability, if any, if you could assign one, to finding a
8 hot spot on a building for this purpose -- strike that. Let
9 me start again.

10 In your experience, what would be the probability
11 of finding a hot spot necessary to contribute whatever it
12 contributed to in this case to the reception of a Monticello
13 signal at the Fort Lee translator at a pre -- at a site
14 where you already had your facilities?

15 Do you understand my question?

16 A I think you've introduced several probabilities.

17 Q Okay, let me try it one more time.

18 In your experience, would it be probable to find a
19 reliable hot spot necessary to contribute what this hot spot
20 contributes to this operation on the top of a building where
21 you already have a lease?

22 A Less than one percent.

23 Q Okay, thank you.

24 Are you familiar with a -- are you familiar with
25 broadcast audio reception equipment in the basement of the

1 Pomona facility?

2 A Mr. Turro told me that for a period of time he was
3 receiving the Pomona translator with a receive system in the
4 basement of the building.

5 JUDGE STEINBERG: Okay. You're talking -- you
6 said in the basement of the Pomona building. I think you
7 misspoke.

8 MR. ARONOWITZ: Okay.

9 JUDGE STEINBERG: But I think Mr. Hurst gave the
10 answer to the question that you should have asked.

11 Let me just ask, where was the basement?

12 THE WITNESS: The basement of Mediterranean
13 Towers.

14 JUDGE STEINBERG: Okay, so that take care of
15 the --

16 MR. ARONOWITZ: Sorry.

17 BY MR. ARONOWITZ;

18 Q In your opinion, well, did you ever personally
19 inspect that?

20 A I did.

21 Q You did. When?

22 A On the 17th day of October of this year, I went to
23 the basement along with Mr. Turro, Mr. Hidle, and a video
24 crew and we were able to listen to the Pomona transmitter
25 and video tape that reception.

1 Q Did you visit the basement of the Fort Lee
2 building prior to October 17th of this year?

3 A No.

4 Q So you never personally inspected the materials
5 there?

6 A No.

7 Q If there were any?

8 A I've never inspected the --

9 Q Okay.

10 A -- materials that were there.

11 JUDGE STEINBERG: While we're on that video, the
12 little Realistic radio that you were using was sitting in a
13 roof on top of the pipe; is that correct?

14 THE WITNESS: That is correct.

15 JUDGE STEINBERG: Does the fact that it was on top
16 of a -- it looked at -- what type of pipe is that? It's not
17 copper pipe. It's the other type that they used in old
18 buildings.

19 THE WITNESS: There was a galvanized metal pipe.

20 JUDGE STEINBERG: Okay, did the fact that the
21 radio was sitting on top of a galvanized metal pipe, in your
22 opinion, affect the reception at all?

23 THE WITNESS: No, no. You could move the radio
24 anywhere around that general area and the reception was the
25 same.

1 JUDGE STEINBERG: Okay. The little white antenna
2 that we saw in the video --

3 THE WITNESS: Which was on the floor.

4 JUDGE STEINBERG: -- was that -- did Mr. Turro or
5 you bring that antenna with you or was that already there?

6 THE WITNESS: It was there. When he abandoned the
7 equipment in the basement, he apparently left his antenna
8 hanging from the conduit. And when the finished that area
9 off, that area has been finished since he was down there,
10 apparently the building crew took it down and just threw it
11 against the wall there where we showed it.

12 JUDGE STEINBERG: So you found it there on the day
13 of your visit?

14 THE WITNESS: That's right, covered in dust, and
15 obviously had not been moved in some time.

16 BY MR. ARONOWITZ;

17 Q But you never saw it prior to October 16th and
18 17th?

19 A Never was in the basement prior.

20 Q The receive equipment set up in the basement in
21 the Fort Lee Mediterranean Towers building, could that
22 produce -- could that equipment receive the same quality of
23 signal as could be received on the roof at the hot spot?

24 A At the receive location in the basement you're
25 able to receive the Pomona station, and it's essentially a

1 hot spot for Pomona.

2 On the roof, the hot spot I described is for
3 reception of the WJUX Monticello. The field on Pomona is
4 fairly constant on the roof of the Mediterranean Tower
5 Building.

6 Q Are you now suggesting there are two hot spots?

7 A I'm suggesting that the extraordinary field in the
8 basement of the building receiving Pomona is unusual, and
9 would -- I would characterize as a hot spot.

10 MR. ARONOWITZ: I know I'm never going to step in
11 this building.

12 One moment.

13 (Pause.)

14 BY MR. ARONOWITZ;

15 Q If the probability of finding a hot spot on a
16 preexisting building for the reception, for the quality of
17 reception in Monticello received at the Fort Lee facility is
18 one percent, what would you figure to be the probability of
19 finding a hot spot in the basement for Pomona?

20 A The same.

21 Q Okay. And I'm no mathematician, but --

22 JUDGE STEINBERG: Well, let's get on --

23 BY MR. ARONOWITZ;

24 Q -- both in the same building?

25 JUDGE STEINBERG: Let's get on with the next

1 question instead of discussing math.

2 MR. ARONOWITZ: Okay.

3 BY MR. ARONOWITZ;

4 Q On page 3 of your supplemental statement, could
5 you please read the first paragraph that begins with regard
6 to "Signal variability," just read that paragraph and let me
7 know when you're done.

8 (Witness reviews document.)

9 THE WITNESS: Okay, I've read it.

10 BY MR. ARONOWITZ;

11 Q And it says there is a seasonal variation with
12 "just perceptible" noise noted for brief periods several
13 days during the year.

14 Do you see that sentence?

15 A I see it.

16 Q And I'm assuming that's correct, to your
17 knowledge?

18 A That's correct to my knowledge as reported to me.

19 Q So you did not determine this yourself?

20 A No, I have been -- I have observed marginal
21 reception and I have been told by Mr. Turro that it is
22 perceptible or just perceptible several days out of the year
23 for brief periods.

24 Q Okay. And did Mr. Turro suggest to you any way to
25 compensate for the seasonal variation?

1 Would he have to make adjustments, for example?

2 A I don't believe we discussed that.

3 Q So you don't know one way or the other?

4 A No, I don't.

5 Q So if he made adjustments, you wouldn't know about
6 it?

7 A That's correct.

8 Q Moving down two paragraph to the paragraph that
9 begins, "One final point," and then I would ask you -- do
10 you see that paragraph?

11 A Yes, I do.

12 Q Okay, the next sentence, "While in the basement"?

13 A Yes.

14 Q "While in the basement of the Mediterranean Tower
15 Building observing the unusual (possibly phenomenal) receive
16 signal from Pomona," what do you mean by "possibly
17 phenomenal" in that case?

18 A Simply that I personally was surprised to see a
19 location in the basement of the building with such a high
20 receive signal.

21 Q Are you aware of any changes in the receive or --
22 in the receive antennas at the Fort Lee translator from 1994
23 to 1997?

24 A I visited the site on the two occasions that I've
25 described, and I did not note any change in antennas between

1 those two visits.

2 Q Have you -- I believe you said, and I'm not sure
3 whether it's in this statement, but have you reviewed Mr.
4 Wilson LaFollette's statement submitted in this proceeding?

5 A I have.

6 Q Okay. And have you been advised about his
7 testimony in this proceeding?

8 A Not really, no.

9 Q Okay. Are you aware that Mr. LaFollette went to
10 Fort Lee to try to determine whether he could receive a
11 Monticello signal somewhere in Fort Lee?

12 A Yes.

13 Q And you are aware that he said he, in effect,
14 could not receive a good quality signal?

15 A I'm aware he said that.

16 Q Okay. Is the hot spot the difference?

17 A In my judgment, no.

18 Q In your judgment, what would be the difference?

19 A Mr. LaFollette apparently did not have as good a
20 quality receiver and had no filtering. Had he had both he
21 would have been able to receive the signal, in my judgment.

22 Q Returning for a moment to the Fort Lee basement,
23 what equipment did you find in the Fort Lee basement?

24 A When I was in the basement, there was an old
25 antenna lying on the floor there that Mr. Turro said had

1 been the antenna he used for his receiver when it was in the
2 basement.

3 Q Okay. And that was it, just the antenna?

4 A That was it.

5 Q And did you state to the Judge that you saw that
6 antenna going up through a galvanized pipe?

7 A No.

8 Q Okay. You mentioned the galvanized pipe.

9 A Yes.

10 Q And how did the antenna go from the basement to
11 the roof?

12 A I'm told that the antenna and receiver were in the
13 basement and that directly behind the area we were standing
14 in where the receiver was installed is the telephone switch
15 block for the entire building; and that the audio,
16 demodulated audio was sent by phone line to the 24th floor.
17 That's the way Mr. Turro explained it to me.

18 JUDGE STEINBERG: Okay, the telephone switch block
19 for the whole building?

20 THE WITNESS: Yes.

21 JUDGE STEINBERG: So that means all the telephone
22 wires in the building terminated at that point?

23 THE WITNESS: That is correct.

24 JUDGE STEINBERG: Could that have any effect on
25 the ability of the antenna in the basement to receive

1 Pomona?

2 THE WITNESS: Possibly. Also, that was where all
3 the water piping feeds to, and that possibly could, but I
4 have no direct knowledge of what causes the high field.

5 JUDGE STEINBERG: It's a possibility, those two
6 things?

7 THE WITNESS: Those two things.

8 MR. ARONOWITZ: Okay. Can I go off the record?

9 JUDGE STEINBERG: Yes, let's -- off the record.

10 (Whereupon, a recess was taken.)

11 JUDGE STEINBERG: Back on the record.

12 BY MR. ARONOWITZ;

13 Q Mr. Hurst, are you familiar with carrier current
14 stations such as those on college campuses where the
15 principal is sending a non-broadcast signal along a wire?

16 A I know they exist.

17 Q Okay. Do you have -- do you understand the
18 principal of how they work generally?

19 A Generally, yes.

20 Q Okay, that's fine.

21 Could you explain how they work, to your
22 understanding?

23 A To my understanding, you impose an RF carrier,
24 usually AM modulated, on a power line, and it's distributed
25 along the power line for short distances. Normally, unless

1 you have special equipment, you cannot get past transformers
2 in the power line system.

3 Q Okay. You said power lines. Could it be other
4 types of wires? Could it be a phone wire or electrical
5 wire?

6 A I'm not sure that would be a carrier current
7 system.

8 Q Okay.

9 A The carrier current refers to the fact you are
10 superimposing on AC line, I think. I mean, that's my
11 understanding.

12 Q Okay. Could you impose a -- is that principle
13 similar to generating a non-broadcast signal and sending it
14 through a dummy load?

15 A I don't understand the question.

16 Q Well, if you are generating a -- if, as I
17 understand you, you're generating a non-broadcast signal
18 over a carrier current.

19 Would that same principle work for generating a
20 non-broadcast which would be a carrier --

21 A I'm not sure what a non-broadcast signal is.

22 JUDGE STEINBERG: I think what Mr. Aronowitz is
23 trying to get to is could you in some way put the audio
24 coming out of the Dumont studio into a wire, run the wire
25 through a building and have whatever the audio coming out of

1 the wire somehow and being received by a receiving antenna.

2 Is that what you're trying to get to, regardless
3 of what the wire is otherwise used for?

4 MR. ARONOWITZ: Correct.

5 JUDGE STEINBERG: Do you understand the question?

6 THE WITNESS: Yes, I understand the question.

7 I suppose you could, and, in fact, it would seem
8 to me that if you did that you would be able to hear the
9 signal all throughout the building.

10 I found with this, that trying to monitor Pomona,
11 I could hear it in the basement and on the roof, but I
12 couldn't hear it on the 25th floor, nor could I hear with a
13 receiver -- or the 24th floor, for that matter. So, you
14 know, I can't say it's impossible. I'm just saying I don't
15 know how you would do it.

16 MR. ARONOWITZ: Okay, thank you.

17 THE WITNESS: Okay.

18 BY MR. ARONOWITZ;

19 Q You were talking before about the TC-8 remote
20 units, and I believe you said that in fact your firm worked
21 with the manufacturer to get the FCC to approve?

22 A Well, we worked with the manufacturer primarily
23 dealing with supplying comments in rulemaking regarding
24 rules associated with remote control and EBS and EAS matters
25 that had been promulgated over the last decade.

1 Q And a TC-8 remote unit can be configured to turn
2 things off and on; is that correct?

3 A That is true.

4 Q And if configured properly, it could take meter
5 readings?

6 A That is true.

7 Q And can it perform other functions?

8 A Depending on how it's interfaced, yes.

9 Q So is one of the reasons that it has become -- and
10 you've testified it's become a popular model?

11 A That is right.

12 Q Particularly recently.

13 JUDGE STEINBERG: Within the last decade.

14 BY MR. ARONOWITZ;

15 Q Within the last decade?

16 A Yes.

17 Q Absolutely.

18 And is one of the reasons for its popularity, in
19 your opinion, the multiple uses it can be configured to
20 perform?

21 A Probably, yes.

22 Q Okay. And with respect to the TC-8 remote units
23 that you may have inspected with respect to Mr. Turro's
24 facility, did you configure those TC-8 remote units?

25 A No.

1 Q Do you know whether they changed -- whether the
2 configurations changed over the years?

3 A No.

4 Q Did Mr. Turro ever discuss with you any changes in
5 configurations he may have made?

6 A No.

7 (Pause.)

8 Q Do you have -- I believe Mr. Naftalin questioned
9 you on the supplemental statement of Gerard Turro, which I
10 believe is Turro No. 32?

11 A Yes.

12 Q Do you have a copy of that in front of you?

13 A I do.

14 Q Okay. On page 2 -- well, you testified earlier
15 that the hot spot that you found on the roof of the
16 Mediterranean Towers was about three to four square feet; is
17 that correct, or two feet?

18 A I believe I said two to three feet square.

19 Q Thank you.

20 When you were testing, and did you test the hot
21 spot when you were on the roof?

22 A I observed the reception of WJUX utilizing a Sony
23 receiver and a headset, and we moved about in the area to
24 listen to it, yes.

25 Q And was the basis -- was the basis for your

1 statement that the hot spot was two to three square feet,
2 did you carry the radio and notice a drop off at two feet,
3 or did you just turn it on here, turn it on in one spot and
4 then go over the roof and turn it on at another?

5 In other words, did you see the drop off once you
6 left the hot spot?

7 A The radio stayed stationary and I moved about with
8 an antenna in my hand.

9 Q And the antenna was the receiver in this case?

10 A Well, the antenna fed the receiver.

11 Q Fed the -- so the receiver stayed within the hot
12 spot?

13 A No, it actually sat on the ground in a vinyl bag,
14 and I had maybe a 15-foot lead between the antenna and the
15 receiver, and then a 15-foot lead between the receiver and
16 the headset. So I could maneuver around with the antenna
17 and listen to the change in audio.

18 Q So what -- this is because I'm not an engineer,
19 what is actually receiving the signal, the radio or the
20 antenna? The antenna, okay.

21 So if the antenna -- is it the antenna that's
22 actually receiving it such that the placement of the radio
23 makes no difference?

24 A Basically, yes.

25 Q Okay. Would moving the radio make any difference?

1 A No, not in this instance.

2 Q Did Mr. Turro inform you that he changed the
3 filters being used with the Fort Lee Station between October
4 '94 and say August '95?

5 A Yes.

6 Q And did you state earlier that the change in
7 filters increased the reliability of the receipt of the --
8 that it increased the reliability?

9 A I've conveyed something to that effect, yes.

10 Q Okay. When you said "increased reliability," for
11 my purposes could you -- increase reliability of what?

12 A The -- it increased reliability by reducing the
13 variability in the system brought about by minor changes in
14 the filtering system. The cavity, tuned cavity filter is
15 less subject to variation due to ambient temperature than
16 the phase canceling notch type filter that was originally
17 used.

18 Q And did the change of these filtering devices have
19 perceptible changes in what one would hear?

20 A I'm told that Mr. Turro felt it did.

21 Q But you did not independently confirm this?

22 A No, I have not sat and listened for prolonged
23 periods to the performance of these various filters.

24 MR. ARONOWITZ: No more, Your Honor.

25 JUDGE STEINBERG: Mr. Riley, do you have any

1 questions that you want to ask?

2 MR. RILEY: Not on the two exhibits, 35 and two of
3 Mr. Turro's no. Mr. Hurst is also a sponsor of an MMBI
4 exhibit which we apparently haven't addressed here. I don't
5 know whether counsel has questions for that.

6 JUDGE STEINBERG: Well, if you want to ask him any
7 questions, you have an opportunity.

8 MR. RILEY: I don't have any questions for him on
9 anything either on the MMBI exhibit -- I just didn't want
10 him to be excused without getting to the MMBI exhibit.

11 JUDGE STEINBERG: Well, if nobody else wants to
12 get it, you're invited.

13 MR. RILEY: I don't invite it. I don't know
14 whether the counsel felt the game was open for the MMBI
15 exhibit.

16 JUDGE STEINBERG: I have a question, and that is,
17 at one time there was a microwave on top of Mediterranean
18 Towers? Are you familiar with that?

19 THE WITNESS: There was a receive antenna, yes.

20 JUDGE STEINBERG: A receive antenna.

21 I'm going to tell you that Mr. Turro testified
22 yesterday that the microwave part of the component was an
23 audio -- an audio path, and the other part of the component
24 was a data path; and that he said that the audio path went
25 into a dummy load because if it didn't something would back

1 up and blow out an amplifier or cause an amplifier --

2 THE WITNESS: Then you would have a mismatch in
3 your --

4 JUDGE STEINBERG: Okay, so he had to take that
5 audio path and put it someplace, and he -- that's where the
6 term "dummy load" came from. I think that's when it was
7 first used.

8 THE WITNESS: Okay.

9 JUDGE STEINBERG: Although if my memory serves me,
10 he called it something else, but he said we can call it a
11 dummy load for short, something like that; whatever the
12 transcript says.

13 My question is could the presence on the roof of
14 the Mediterranean Tower of the microwave audio path dummy
15 load have any contributing -- could that be any contributing
16 factor to the existence of a hot spot?

17 THE WITNESS: No.

18 JUDGE STEINBERG: And can you explain why?

19 THE WITNESS: Yes. Now, I did not hear Mr.
20 Turro's testimony.

21 JUDGE STEINBERG: Right, you have to take my word
22 that that's what he said.

23 THE WITNESS: But you have to understand what his
24 problem was. He had a receiver which had a demodulated
25 audio output, and in order for the receiver to -- the

1 microwave receiver to function properly, it would normally
2 have to have that output terminated, and you would terminate
3 it either into speakers or into the transmitter for the --
4 or a translator, if that's what you were going to use.

5 But since it was terminated in neither, he
6 terminated it in a resistive load called a dummy load. I do
7 the same thing with my sound system at home for speakers out
8 on the patio. When I turn them off, I terminate it into a
9 resistive load so that I don't unbalance the amplifier of my
10 sound system. It's doing the same thing.

11 But you are dealing at an audio frequency and
12 therefore that would be totally independent of any RF
13 variation on the roof because the frequencies are totally
14 unrelated.

15 JUDGE STEINBERG: Mr. Naftalin?

16 REDIRECT EXAMINATION

17 BY MR. C. NAFTALIN:

18 Q Mr. Hurst, at some point, I think it was during
19 Mr. Aronowitz's questioning, he asked you about whether you
20 had personal knowledge of Mr. Turro's use of a phase
21 canceler which he has testified about in his supplemental
22 statement, Turro Exhibit No. 32, and you said that you had
23 not personally observed it in operation; is that right?

24 A I did not observe it when it was installed at the
25 Fort Lee site. But I have seen it and we brought it with

1 us.

2 Q Well, you perceive me as usual, sir.

3 Let me bring up to you something.

4 MR. C. NAFTALIN: For the record, I am handing the
5 witness a metallic instrument, I would estimate three inches
6 by three inches by 10 inches long; blue metal.

7 BY MR. C. NAFTALIN:

8 Q Would you describe this, Mr. Hurst, and tell us
9 what it is?

10 A It's a box that has written on it "phase
11 canceler." It's Model 2903. The sticker on it says
12 "54/108," which I presume to be the frequency that it works
13 over, and a "10/94" which I presume to be the date it was
14 manufactured.

15 Q Do you know anything else specifically about this
16 unit, Mr. Hurst?

17 A Well, Mr. Turro provided it to us and told us this
18 was the unit he used, and in our laboratory Mr. Hidle tested
19 its performance, and in his supplemental statement he has
20 reported on that performance.

21 Q Okay.

22 A Which is basically that it provides a 45 dB notch
23 of an adjacent channel signal.

24 Q And just to be clear, can you identify when this
25 unit was manufactured?

1 A I see a 10/94, which I presume is either the
2 manufacture or the sale date.

3 Q Okay. And why do you presume that?

4 A Because that's normal nomenclature for a
5 manufacturer.

6 MR. ARONOWITZ: Excuse me, Your Honor. I would
7 like to lodge a quick objection.

8 I'm not sure what this is relevant to.

9 JUDGE STEINBERG: Mr. Naftalin?

10 MR. ARONOWITZ: We didn't challenge the
11 performance of this.

12 MR. C. NAFTALIN: Well, we are -- the performance
13 of it will be testified to later. There is -- Mr. Turro has
14 provided this as the phase canceler he had in use, and it
15 shows what appears to be a manufacture date of October of
16 1994, which would be consistent with his testimony that he
17 had this thing in place in October of 1994. This is more
18 independent evidence to support his testimony.

19 Your Honor, I have more pictures in my camera if
20 we need to submit pictures.

21 JUDGE STEINBERG: Yes, let's take a couple
22 pictures of that too.

23 MR. C. NAFTALIN: I will do that we we're off the
24 record.

25 JUDGE STEINBERG: Right.

1 MR. C. NAFTALIN: Thank you.

2 JUDGE STEINBERG: And if anybody wants to get into
3 the record it's an FCC proceeding, you can hold it up and
4 smile.

5 MR. C. NAFTALIN: A couple other quick points and
6 then we will be done here.

7 BY MR. C. NAFTALIN:

8 Q Mr. Hurst, let's return to the subject of dummy
9 loads or carrier current systems or anything along those
10 lines.

11 You have testified that you visited the
12 Mediterranean Towers roof on two occasions. Did you see a
13 dummy load or a carrier current system or anything of that
14 nature?

15 A No, I did not.

16 Q Did you detect anything of that nature?

17 A No, I did not.

18 Q Do you think there is one in operation?

19 A I do not think there is anything.

20 Q Okay, thank you.

21 You were asked a question about TC-8 remote
22 control units and their ability to remotely adjust power on
23 transmitters.

24 Do you know one way or the other whether the
25 transmitters installed at the Monticello station, at the

1 Fort Lee translator could have their power adjusted
2 remotely?

3 A None of the transmitters can be adjusted remotely.
4 Only the WJUX transmitter can be adjusted at all, and that's
5 a local adjustment. The translator transmitters are a fixed
6 output.

7 Q And by "fixed output," that means a TC-8 unit
8 cannot remotely change their powers?

9 A And, in fact, you can't monitor their power.

10 Q Thank you.

11 A You buy them with a specified power output.

12 Q Okay. Mr. Hurst, is it -- you've been a
13 consulting engineer for something on the order of 35 years?

14 A That's correct.

15 Q During the normal course of your practice when
16 clients need your advice, do you rely on their
17 representations?

18 A Certainly.

19 Q They call you up and say, "Gee, I have such and
20 such a condition. What do you think about it? What should
21 I do?" Do you ordinarily rely on that?

22 A Yes.

23 Q Do you consider it necessary in all cases to rush
24 out there and observe their equipment yourself personally?

25 A No, I do not.